From: <u>Hatfield, William S.</u>
To: <u>Broderick, John (ENRD)</u>

 Cc:
 Yacovone, Krista; Otero, Camille V.

 Subject:
 RE: follow-up on this week"s meeting.

 Date:
 Monday, October 7, 2019 11:41:18 AM

John:

Yes - IES is available to meet on Oct. 29. To allow for travel, we request an early afternoon meeting time, if possible.

Thank you,

Bill

William S. Hatfield, Esq.

Director, Environmental Law Department
GIBBONS P.C.

Newark | New York | Trenton | Philadelphia | Wilmington
One Gateway Center, Newark, NJ 07102-5310
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From: Broderick, John (ENRD) < John. Broderick@usdoj.gov>

Sent: Monday, October 7, 2019 9:34 AM

To: Hatfield, William S. <WHatfield@gibbonslaw.com>
Cc: Yacovone, Krista <yacovone.krista@epa.gov>
Subject: RE: follow-up on this week's meeting.

Bill,

Checking back in to see if 10/29 works for you and your client. I'd like to get a date finalized by today if at all possible. This date works for Praxair and G-I, and both of them are planning on bringing their clients to the meeting.

Thanks, John

From: Hatfield, William S. < WHatfield@gibbonslaw.com>

Sent: Monday, September 30, 2019 6:59 PM

To: Broderick, John (ENRD) < <u>JBroderick@ENRD.USDOJ.GOV</u>>

Cc: Yacovone, Krista < <u>yacovone.krista@epa.gov</u>> **Subject:** Re: follow-up on this week's meeting.

John:

I will check with the client and get back with you.

Thanks.

William S. Hatfield, Esq.

Director, Environmental Law Department

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On Sep 30, 2019, at 6:47 PM, Broderick, John (ENRD) < John.Broderick@usdoj.gov> wrote:

Bill,

Did you see my email requesting the 10/29 date? Also, do you know if Robin or anyone else from IES is planning on attending?

Thanks, John

From: Hatfield, William S. < WHatfield@gibbonslaw.com>

Sent: Monday, September 30, 2019 4:32 PM

To: Broderick, John (ENRD) < <u>JBroderick@ENRD.USDOJ.GOV</u>>

Cc: Yacovone, Krista < <u>vacovone.krista@epa.gov</u>> **Subject:** Re: follow-up on this week's meeting.

John:

That date will be tough. Any way we can do it later that week? Thanks.

Bill

William S. Hatfield, Esq.

Director, Environmental Law Department

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On Sep 30, 2019, at 1:18 PM, Broderick, John (ENRD) < John.Broderick@usdoj.gov> wrote:

Bill.

Would the afternoon of 10/21 work for you to meet? It looks like it could potentially work for others.

Thanks, John

From: Broderick, John (ENRD)

Sent: Thursday, September 26, 2019 4:23 PM

To: Hatfield, William S. < <u>WHatfield@gibbonslaw.com</u>> **Cc:** Yacovone, Krista < <u>yacovone.krista@epa.gov</u>>

Subject: follow-up on this week's meeting.

Dear Bill,

Thanks for joining Krista and me in New York this week, and please pass along our thanks to Robin as well. Attached is the sign-in sheet from that meeting. Understanding your litigation positions, we're glad that IES was open to meet and to discuss the prospect of settlement alongside G-I and Praxair.

As discussed, we would like to engage all three parties in a settlement meeting to be held next month in New York. Please let us know your availability to meet on October 21, 22, 23, or 24th.

At least three business days prior to the meeting, we would like IES' ballpark settlement offer in order to discuss the prospects of settling with our management.

And please keep us posted on the progress that IES is making on the supplement to its information request.

Feel free to reach out with any questions or updates.

Thanks, John

John Broderick
Trial Attorney
Environmental Enforcement Section
U.S. Department of Justice
(202)305-0302

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